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BISSELL Homecare, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:)	
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653 (KRH)
)	Chapter 11
)	Jointly Administered
Debtors.)	
)	

**JOINDER OF BISSELL HOMECARE, INC. TO MOTIONS OF PIONEER
ELECTRONICS, INC. AND SAMSUNG ELECTRONICS AMERICA, INC. FOR AN
ORDER REQUIRING A CONFIRMATION DEPOSIT PURSUANT TO
BANKRUPTCY RULE 3020(a)**

BISSELL Homecare, Inc. ("BISSELL") by and through its undersigned counsel, hereby respectfully filed this "Joinder of BISSELL Homecare, Inc. to Motions of Pioneer Electronics, Inc. and Samsung Electronics America, Inc. for an Order Requiring a Confirmation Deposit Pursuant to Bankruptcy Rule 3020(a)" and in support hereof, states as follows:

1. BISSELL filed its request for payment of its administrative expense from the above captioned debtors and debtors-in-possession (the "Debtors") pursuant to 11 U.S.C. §503(b)(9) (the "BISSELL Administrative Expense"). Such request has been designated as Number 1293 on the register maintained by Kurtzman Carson Consultants in these proceedings.

2. By its “Fifty-First Omnibus Objection to Certain 503(b)(9) Claims” (the “Objection”), the Debtors have sought to temporarily disallow a portion of the BISSELL Administrative Expense. BISSELL has opposed the relief request in the Objection, which Objection the Court has heard arguments on and taken under advisement.

2. Contemporaneously herein, BISSELL is filing its objection to the Debtors’ “First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors In Possession and its Official Committee of Creditors Holding General Unsecured Claims” (ECF Doc. No. 5124, the “Plan”). A hearing on confirmation of the Plan is presently scheduled for November 23, 2009.

3. BISSELL hereby joins the motions of Pioneer Electronics, Inc. (ECF Doc. No. 5461, “Pioneer”) and Samsung Electronics America, Inc. (ECF Doc. No. 5614, “Samsung”) for an order requiring a confirmation deposit pursuant to Federal Rule of Bankruptcy Procedure 3020(a). For the reasons stated in the Samsung and Pioneer motions, the Debtors should be required to deposit funds into a special account in an amount sufficient to cover all amounts required to be paid on the effective date of the Plan, including the amount asserted in the BISSELL Administrative Expense.

4. BISSELL respectfully reserves the right to rely on the arguments and authorities contained in the joinder or other responses of other creditors seeking an order requiring a confirmation deposit or similar relief in these cases.

5. Nothing herein should be construed as conceding the Debtors’ entitlement to any portion of the preference claim described or claimed by the Debtors in the Objection. To the contrary, BISSELL denies that the preference claim is valid and expressly reserves all of its defenses to the merits of the Debtors’ alleged preference claims.

Dated: Staunton, Virginia
November 16, 2009

WHARTON, ALDHIZER & WEAVER, P.L.C.

/s/ Stephan W. Milo

STEPHAN W. MILO, ESQ. (VSB#42156)

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Counsel for BISSELL Homecare, Inc.

CERTIFICATE OF SERVICE

I, Stephan W. Milo, hereby certify that a true and correct copy of the foregoing "Objection of BISSELL Homecare, Inc. to First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims" has been served upon the parties listed below via first-class mail, postage prepaid on November 16, 2009 and parties-in-interest who are included in the United States Bankruptcy Court's ECF email notification system for this case by virtue of the electronic filing of same.

<u>The Debtors</u> Circuit City Stores, Inc. 4951 Lake Brook Dr., Suite #500 Glen Allen, VA 23060 Attn: Michelle Moiser	<u>Office of the U.S. Trustee</u> 701 East Broad Street, Suite 4304 Richmond, VA 23219 Attn: Robert B. Van Arsdale
<u>Debtor's Counsel</u> SKADDEN, ARPS, SLATE, MEAGHER & FLOAM, LLP One Rodney Square 10 th and King Streets, 7 th Floor Wilmington, DE 19801 Attn: Gregg M. Galardi Attn: Ian S. Fredericks SKADDEN, ARPS, SLATE, MEATHER & FLOAM, LLP 155 N. Wacker Dr Chicago, IL 60606 Attn: Chris L. Dickerson Attn: Jessica S. Kumar MCGUIRE WOODS LLP One James Center 901 E. Cary Street Richmond, VA 23219 Attn: Douglas M. Foley Attn: Sarah M. Boehm	<u>Counsel for the Creditors' Committee</u> PACHULSKI STANG ZIEHL & JONES, LLP 10100 Santa Monica Boulevard, 11 th Floor Los Angeles, CA 90067 Attn: Jeffrey N. Pomerantz Attn: Stanley E. Goldich PACHULSKI STANG ZIEHL & JONES, LLP 780 Third Avenue, 36 th Floor New York, NY 10017 Attn: Robert J. Feinstein TAVENNER & BERAN, PLC 280 N. Eighth Street, 2 nd Floor Richmond, VA 23219 Attn: Lynn L. Tavenner Attn: Paula S. Beran

/s/ Stephan W. Milo
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